

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA

-against-

MILES GUO, KIN MING JE,
and YVETTE WANG,

Defendants.

23 Cr. 118 (AT)

**PETITION PURSUANT TO 21 U.S.C.
§ 853(n) TO ASSERT THIRD-PARTY
INTEREST IN FORFEITED
PROPERTY AND REQUEST
INVESTIGATION (updated)**

I, Yaping Ding, residing at Auckland, New Zealand, submit this petition under penalty of perjury pursuant to 21 U.S.C. § 853(n) to assert my potential legal interest in property subject to forfeiture in the above-captioned case and to request further investigation by the Court or the United States Attorney's Office to determine the extent of my interest.

1. Description of Property

The property at issue may include funds totalling approximately US\$410,412 in one or more bank accounts identified in the Notice of Forfeiture dated February 6, 2025. Due to the complexity of the financial transactions involved, I am unable to determine the exact location or status of my investments.

2. Nature and Extent of Interest

I am a bona fide investor who transferred the following funds in good faith for the New Zealand Farm Loan Project, G-Clubs membership, and Himalaya Exchange HDO top-ups:

- NZ\$27,508.63 (approx. US\$18,000) on August 6, 2020, to ASB Bank account 26897405-USD-22, account name "J L," managed by Xuebing Wang¹, Vognz2020 Limited, for the New Zealand Farm Loan Project.
- US\$18,000 on August 6, 2020, to ASB Bank account 26897405-UAD-22, account name "J L," managed by Xuebing Wang, Vognz2020, for the New Zealand Farm Loan Project.
- RMB760,000 (approx. US\$107,500) on December 2, 2020, in two transfers (RMB600,000 and RMB160,000), to multiple bank accounts in China managed by Xuebing Wang, Vognz2020 Limited, for the New Zealand Farm Loan Project.
- RMB300,000 (approx. US\$42,440) on December 4, 2020, to multiple banks' accounts managed by Xuebing Wang, Vognz2020 Limited, for the New Zealand Farm Loan Project.
- US\$100,000 on October 19, 2020, in two transfers of US\$50,000 each, to Signature Bank account 1504005603, managed by G Club Operations LLC, for G-Clubs membership (account IDs: 1000640000000031 and 1000640000000152).

¹ XueBing Wang, a former director of Himalaya New Zealand Eden Farm, so-called a victim of the Defendant, made his statement on s page 74, Case 1:23-cr-00118 Document 477-1.

- US\$40,000 on March 13, 2021, to Deutsche Bank Trust Company Americas account 00455662, managed by Associated Foreign Exchange, for the New Zealand Farm Loan Project and G-Clubs membership (account ID: 6421000000100525).
- US\$70,472 from January 10 to March 30, 2022, in six transfers to Metropolitan Commercial Bank account 7801000254, managed by Himalaya International Clearing Ltd, for Himalaya Exchange HID XD85I24 HDO top-ups:
 - US\$20,000 on January 10, 2022;
 - US\$1,992 on January 20, 2022;
 - US\$15,000 on January 30, 2022
 - US\$13,000 on February 2, 2022;
 - US\$15,000 on February 4, 2022;
 - US\$13,500 on February 5, 2022;
 - US\$5,980 on March 30, 2022.
- US\$4,900 on January 19, 2022, in two transfers of US\$2,450 each, to G-Clubs accounts 1000640000000031 (Order No. YA2201152250441) and 10006400000000152 (Order No. GU2201152254001), via Himalaya Exchange XD85I24 HDO, for annual fees.
- US\$2,000 on July 4, 2022, to G-Clubs account 6421000000100525 (Order No. CU2207031045501), via Himalaya Exchange XD85I24 HDO, for an annual fee
- US\$7,000 on July 25, 2023, in three transfers to G-Clubs accounts via Himalaya Exchange XD85I24 HDO, for annual fees (unconfirmed):
 - US\$2,500 to account 1000640000000031 (Order No. GN2305161116091);
 - US\$2,500 to account 10006400000000152 (Order No. BM2305161113011);
 - US\$2,000 to account 6421000000100525 (Order No. VY2305161118201).

Due to third-party management of these investments (e.g., Vognz2020 Limited, G Club Operations LLC, Associated Foreign Exchange, Himalaya International Clearing Ltd), I lack specific knowledge of whether these funds are held in the accounts subject to forfeiture.

3. Basis for Request

I transferred the aforementioned funds in good faith as an investor or buyer, not as a victim of the defendants, without knowledge of any criminal activity. I never requested a refund or withdrew my investment. This is evidenced by wire transfer records and investment agreements, available upon request.

The complexity of the financial transactions in this case prevents me from confirming whether my investments are included in the forfeited property without further investigation by the Court or the Government.

4. Request for Relief

I respectfully request:

- A hearing pursuant to 21 U.S.C. § 853(n)(4) to adjudicate my potential interest in the forfeited property.
- An investigation by the Court or the United States Attorney's Office to trace my investments and determine if they are part of the forfeited assets. If so, I request amendment of the Notice of Forfeiture to exclude my interest.
- **For privacy and security reasons, redaction of my personal information—including my full address, email, and signature—from any publicly available version of this petition uploaded by the Court.**

Supporting Evidence

I will provide wire transfer receipts, investment agreements, and correspondence with the involved entities upon request, demonstrating my good-faith investments.

Declaration

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on April 7, 2025 (NZ Time), at Auckland, New Zealand.



Yaping Ding



Filing and Service

This ancillary petition is filed with the Clerk of the Court, United States District Court, Southern District of New York, 500 Pearl Street, Room 120, New York, NY 10007, on April 7 and an earlier version on April 6, 2025 (US East Time). via NZ Post. A copy has been served on Assistant United States Attorney Ryan Finkel, Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on April 7 and an earlier version on April 6, 2025 (US East Time), via NZ Post.